

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

VINCENT REED,	)	
	)	
Plaintiff,	)	
	)	CASE NO. 1:14-CV-01061-SCJ
vs.,	)	
	)	
ALLCONNECT, INC.,	)	
	)	
Defendant.	)	
_____	)	

**JOINT MOTION TO TRANSFER**

Plaintiff Vincent Reed (“Plaintiff”) and Defendant Allconnect, Inc. (“Defendant”), by and through the undersigned counsel, hereby move the Court to transfer this action (“the *Reed* case”) to United States District Judge William S. Duffey, Jr. for the foregoing reasons:

1. Plaintiff was given notice to opt-into and join the case *Randle v. Allconnect*, 1:14-cv-00245-WSD, a collective action brought under the Fair Labor Standards Act (“FLSA”) and currently pending before Judge Duffey. Plaintiff declined to join the *Randle* collective action.

2. On April 10, 2014, Plaintiff filed this individual FLSA action against Defendant. (Dkt. No. 1.) The claims raised by Plaintiff in this individual FLSA

action are based on substantially the same factual allegations and legal theories as are being asserted in the *Randle* collective action.

3. On May 7, 2014, two additional putative opt-in plaintiffs in the *Randle* collective action filed individual FLSA actions against Defendant. *See Adams v. Allconnect, Inc.*, Case No. 1:14-cv-01375-RWS; *Green v. Allconnect, Inc.*, Case No. 1:14-cv-01384-TWT. The *Adams* and *Green* actions are based on substantially the same factual allegations and legal theories as are being asserted in this action and in the *Randle* collective action. Moreover, counsel for Plaintiff in this action is also representing the Plaintiffs in the *Adams* and *Green* actions.

4. On July 24, 2014, Defendant filed a Motion to Consolidate this action, as well as the *Adams* and *Green* actions, with the *Randle* collective action. (Dkt. No. 21.)

5. The parties conferred and, in lieu of Defendant's Motion to Consolidate, have agreed to transfer of the cases to Judge Duffey, thus allowing the parties to litigate the matters in front of the same judge, preserving judicial resources and avoiding potentially inconsistent rulings among substantially similar cases;

6. The parties therefore respectfully request that this case be transferred to United States District Judge William S. Duffey, Jr. The parties represent and

warrant that this Joint Motion is brought in good faith and will not prejudice either party.

Respectfully submitted this 8<sup>th</sup> day of August, 2014.

/s/ Louis R. Cohan

Louis R. Cohan  
Georgia Bar No. 173357  
Michelle Wein  
Georgia Bar No. 385424  
COHAN LAW GROUP, LLC  
3340 Peachtree Road, Suite 580  
Atlanta, Georgia 30326  
Tel: 404-891-1770  
Fax: 404-891-5094  
[lcohan@cohanlawgroup.com](mailto:lcohan@cohanlawgroup.com)  
[mwein@cohanlawgroup.com](mailto:mwein@cohanlawgroup.com)

COUNSEL FOR PLAINTIFF

/s/Matthew R. Simpson

Calvin R. Wright  
Georgia Bar No. 672501  
Mairen C. Kelly  
Georgia Bar No. 413015  
Matthew R. Simpson  
Georgia Bar No. 540260  
FISHER & PHILLIPS LLP  
1075 Peachtree Street NE  
Suite 3500  
Atlanta, Georgia 30309  
Tel: 404-231-1400  
Fax: 404-240-4249  
[cwright@laborlawyers.com](mailto:cwright@laborlawyers.com)  
[msimpson@laborlawyers.com](mailto:msimpson@laborlawyers.com)

COUNSEL FOR DEFENDANT

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vs.,	)	
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	)	
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_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

Louis R. Cohan  
Cohan Law Group, LLP  
3340 Peachtree Road NE, Suite 580  
Atlanta, GA 30326  
[lcohan@cohanlawgroup.com](mailto:lcohan@cohanlawgroup.com)

/s/Matthew R. Simpson  
Matthew R. Simpson